

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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IN RE: **George Merkel**  
**Laura Ann Merkel fka Laura A. Foy**  
**Debtors**

**JPMorgan Chase Bank, National Association**  
**Moving Party**

**vs.**

**George Merkel**  
**Laura Ann Merkel fka Laura A. Foy**  
**Debtors**

**Charles J. DeHart, III Esq., (Trustee)**

**BK NO. 15-01918 RNO**

**Chapter 13**

**Pleading: Motion for Relief**

**REQUEST TO REMOVE FROM THE HEARING/TRIAL LIST**

CHECK ONE:

☐ The undersigned hereby withdraws the above-identified pleading with the consent of the opposition, if any.

☒ The undersigned counsel certifies as follows:

- (1) A settlement has been reached which will be reduced to writing, executed and filed within forty-five (45) days.
- (2) If a stipulation is not filed or a hearing requested within forty-five (45) days, it is understood that this proceeding will be dismissed without prejudice.
- (3) Contemporaneous with the filing for this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: January 25, 2017

**/s/ James C. Warmbrodt, Esquire**

James C. Warmbrodt, Esquire  
Attorney for Moving Party  
KML Law Group, P.C.